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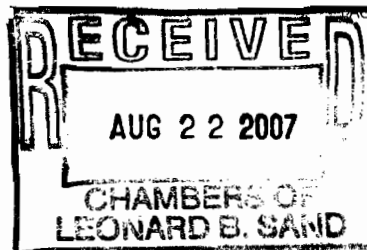
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August 21, 2007



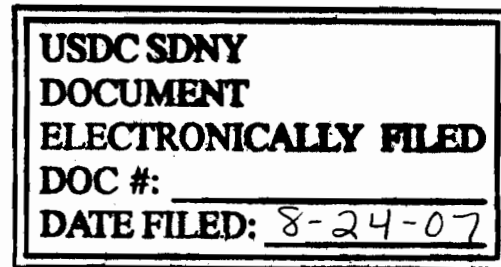
Our ref: 170-07/DPM/PLS

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MEMO ENDORSED

BY HAND

Honorable Judge Leonard B. Sand
United States District Court
Southern District of New York
U. S. Courthouse
500 Pearl Street
New York, NY 10007



RE: Mountiko Marine Co. Ltd. v. Peak Star Trading Co. LLC,
Pawan Jain & Sons and Societe Pragati S.A.R.L. a/k/a
Pragati International, 07 CV 3334 (LBS)

Dear Judge Sand:

We represent the plaintiff in the captioned matter and write to request an additional 60 days to serve the defendant Pawan Jain & Sons with a copy of the Summons and Verified Complaint. This is our first request for such relief.

By way of background, Plaintiff initiated this action as an ancillary matter to London arbitral proceedings that it was soon to commence, seeking security for its maritime claims in the London arbitration via an attachment of the three defendants property in this District pursuant to Rule B. The requested Rule B attachment was granted, and the Plaintiff has been successful in restraining funds from defendants Societe Pragati S.A.R.L. a/k/a Pragati International and Peak Star Trading Co. LLC. We immediately advised those Defendants of the restraint, but have not been contacted by them regarding the attachment. Accordingly, we have now taken steps to serve these defendants with the Summons and Complaint.

MEMO ENDORSED

Despite continued efforts to restrain funds of the defendant Pawan Jain and Sons, we have not been successful in restraining any assets, but efforts to do so are continuing. If we were to notify that defendant of these proceedings now, before any property is restrained, it would defeat the purpose for which the attachment was sought and this Court's Order issued.

We therefore respectfully request that we be granted an extension of time to serve Pawan Jain and Sons with the Complaint for a period of 60 days, up to and including, October 23, 2007. We note that Local Admiralty Rule B.2 recognizes the importance of keeping Rule B actions *ex parte* until property is actually restrained, and provides that notice of the attachment is not required to be given to the defendant until after its property has been restrained.

We thank the Court for its attention to this matter.

Very truly yours,

FREEHILL HOGAN & MAHAR, LLP



Pamela L. Schultz

Extension granted as requested.
So ordered



JSJ
8/27/07

MEMO ENDORSED